

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

DISCOVERY GLOBAL CITIZENS
MASTER FUND, LTD., et al.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC., et al.,

Defendants.

Civil Action No. 16-7321(MAS)(LHG)

MSD TORCHLIGHT PARTNERS, L.P.,
et al.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC., et al.,

Defendants.

Civil Action No. 16-7324(MAS)(LHG)

BLUEMOUNTAIN FOINAVEN MASTER
FUND L.P., et al.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC., et al.,

Defendants.

Civil Action No. 16-7328(MAS)(LHG)

INCLINE GLOBAL MASTER LP, et al.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC., et al.,

Defendants.

Civil Action No. 16-7494(MAS)(LHG)

VALIC COMPANY I, et al.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC., et al.,

Defendants.

Civil Action No. 16-7496(MAS)(LHG)

JANUS ASPEN SERIES, et al.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC., et al.,

Defendants.

Civil Action No. 16-7497(MAS)(LHG)

STIPULATION AND

ORDER

WHEREAS, Plaintiffs in the above-captioned actions have filed complaints against Valeant Pharmaceuticals International, Inc., J. Michael Pearson, and Howard B. Schiller (together, “Defendants,” and together with Plaintiffs, the “Parties”);

WHEREAS, as set forth in the Amended Stipulation and Order entered by this Court on April 12, 2017 (the “April 12 Stipulation”), the Parties agreed to designate *Janus Aspen Series, et*

al. v. Valeant Pharmaceuticals International, Inc., Case No. 16-7497 (the “*Janus Action*”) as a “lead case.”

WHEREAS, the April 12 Stipulation required Plaintiffs in the *Janus Action* to file an amended complaint no later than April 28, 2017.

WHEREAS, in accordance with the April 12 Stipulation, Plaintiffs filed an Amended Complaint and Demand for Jury Trial in the *Janus Action* (the “Amended Complaint”) on April 28, 2017.

WHEREAS, the April 12 Stipulation also requires Defendants to move to dismiss, answer, or otherwise respond to the Amended Complaint on or before June 2, 2017.

WHEREAS, the April 12 Stipulation further provides that Defendants’ time to respond to the complaints in the remaining five above-captioned actions is stayed until after a decision on any motion to dismiss the Amended Complaint in the *Janus Action*.

WHEREAS, on May 12, 2017, Defendants and plaintiffs in four related actions, *T. Rowe Price Growth Stock Fund, Inc. v. Valeant Pharmaceuticals International, Inc.*, Civil Action No. 3:16-cv-7658-MAS-LHG, *Equity Trustees Limited v. Valeant Pharmaceuticals International, Inc.*, Civil Action No. 3:16-cv-6127-MAS-LHG, *Principal Funds, Inc. v. Valeant Pharmaceuticals International, Inc.*, Civil Action No. 3:16-cv-6128-MAS-LHG, and *BloombergSen Partners Fund LP v. Valeant Pharmaceuticals International, Inc.*, Civil Action No. 3:16-cv-7212-MAS-LHG, stipulated and agreed that Defendants will have until June 16, 2017 to answer, move to dismiss, or otherwise respond to the complaints in those actions; that plaintiffs will have until July 28, 2017 to oppose any such motion to dismiss; and that Defendants will then have until August 25, 2017 to file any replies in support of their motion(s).

WHEREAS, the Parties have conferred and agree that, in the interest of efficiency, Defendants will file motions to dismiss, and omnibus supporting briefs, in the *Janus* Action and the other five above-captioned matters concurrently, notwithstanding the provisions of the April 12 Stipulation.

WHEREAS, Plaintiffs agree to extend Defendants' time to move to dismiss from June 2, 2017 through June 16, 2017, consistent with the proposed briefing schedule in the four related actions discussed above.

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of the Parties, as follows:

1. Defendants shall file motions to dismiss in all six of the above-captioned actions, supported by omnibus briefs by each Defendant, on or before June 16, 2017;
2. Plaintiffs shall file their opposition briefs on or before July 28, 2017; and
3. Defendants shall file their reply briefs on or before August 25, 2017.

Stipulated and agreed to by:

DATED: May 26, 2017

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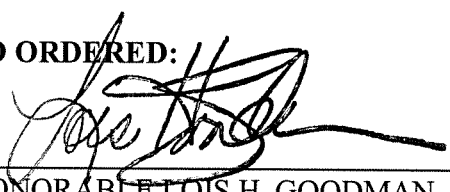
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Counsel for J. Michael Pearson

SO ORDERED:



HONORABLE LOIS H. GOODMAN
United States Magistrate Judge

DATED : 6/6/2017